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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Administration of the North) CC Docket No. 92-237
American Numbering Plan)

REPLY COMMENTS OF BELLSOUTH

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SUMMARY

Many of the comments filed in this proceeding reflect a general consensus among industry segments concerning a proposed future framework for the administration of the North American Numbering Plan ("NANP"). While some of the comments differ concerning the precise details of the future structure, there is broad support for a framework that provides for a centralized open industry process to develop NANP policy recommendations and to resolve technical issues. There is also significant support for a separate NANP administration function. BellSouth supports this conceptual framework and believes it is the initial step in the creation of a process to address the increasingly complex numbering issues facing the industry. BellSouth, therefore, urges the Commission to adopt this framework and to expeditiously establish parameters for the future NANP administrative function.

Specifically, BellSouth supports a NANP structure that consists of an independent NANP administrator and a World Zone 1 Numbering Organization with both policy development and technical support responsibility. BellSouth also recommends that the NANP structure be sponsored by the Alliance for Telecommunications Industry Solutions ("ATIS"). The Commission should authorize ATIS to sponsor the establishment and creation of such a numbering forum to further analyze and develop the details for the transition of the administration of the NANP to a new entity.

Many of the commenters also support the continued use of industry fora to address numbering issues, including certain issues contained in this NPRM. The Commission should therefore authorize the industry, through the World Zone 1 Numbering Organization to further review certain issues raised in this proceeding. For example, BellSouth recommends that the Commission delay the adoption of a funding proposal for the NANPA function and authorize the World Zone 1 Numbering Organization to develop a recommendation for the recovery of expenses associated with numbering matters. Similarly, BellSouth recommends that the Commission direct the industry, through the new World Zone 1 Numbering Organization, to further analyze the issues raised by the transfer of the Central Office Code assignment function to a new organization.

BellSouth continues to support an eighteen month period for transition to 4 digit Carrier Identification Code ("CIC"). The six year transition period as recommended by the Commission has no correlation to the availability of codes and can potentially exacerbate dialing parity and administrative problems.

BellSouth also encourages the Commission to require the industry to continue to consider the use of alternative dispute resolution techniques. In particular, BellSouth recommends that the Commission become more involved in alternative dispute resolution techniques by establishing

time frames for the industry to resolve certain matters. Further, the Commission should encourage the industry to resolve issues through procedures as described in the Administrative Dispute Resolution Act (ADRA) and the Negotiated Rulemaking Act (NRA). Under procedures similar to the procedures described in these Acts, the Commission would be an active participant along with industry representatives in committees addressing numbering disputes.

Finally, BellSouth recommends that the Commission confirm the current procedures for handling intraLATA interstate traffic. Any modification of this requirement prior to BellSouth obtaining the authority to provide interLATA service would place BellSouth at a significant disadvantage. Further, the modification of the current procedure in isolation and without consideration of proceedings to address intrastate intraLATA traffic could create significant administrative expense and customer confusion.

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BellSouth Telecommunications, Incorporated
("BellSouth") hereby submits the following Reply Comments to
the Notice of Proposed Rulemaking ("NPRM") FCC 94-79,
released by the Federal Communications Commission
("Commission") in the above captioned Docket on
April 4, 1994.

I. Future NANP Administrative Framework

A. World Zone 1 Numbering Organization

In its Reply Comments to the Notice of Inquiry
("NOI") and Comments to the NPRM, BellSouth recommended the
creation of a new World Zone 1 Numbering Forum to coordinate
the examination and resolution of numbering issues.¹ It was
BellSouth's intent to encourage the Commission to adopt a
consolidated industry approach to the resolution of number
issues, including policy matters.

Under BellSouth's proposed framework, a World Zone 1
Numbering Organization would serve as a centralized
numbering forum to address numbering issues that involve

¹ BellSouth Reply Comments, pp. 1-9; BellSouth
Comments, pp. 6-9.

both policy and technical matters. The World Zone 1 Numbering Organization would also be open to all participants and industry segments in World Zone 1.

Numerous commenters in this proceeding endorsed the fundamental parameters of the proposed framework.² While many of the commenters used different terminology to describe the components and organizations within this framework, there was widespread support for a structure consisting of a single organization with responsibility for policy and technical issues regarding numbering matters. Under this proposed structure, there would also be an independent third party entity that would function as the administrator of the NANP.

BellSouth supports the Alliance for Telecommunications Industry Solutions sponsoring the World Zone 1 Numbering Organization. As one of its most important functions, the World Zone 1 Numbering Organization would have primary responsibility for the analysis and resolution of significant policy issues. Several commenters endorsed this concept and recommended the creation of a policy committee or an oversight committee to address significant policy

² BellSouth, pp. 6-9; GTE, pp. 7-9; U.S. West, pp. 4-6; AT&T, pp. 8-12; Ameritech, p. 18; NYNEX, pp. 4-9; USTA, pp. 5-7; Sprint, pp. 8-9; Bell Atlantic, pp. 4-5; ATIS, pp. 5-10.

issues.³ Thus, while the commenters had differing views as to where policy issues should be addressed in a new World Zone 1 Organization, there was broad support for including consideration of these issues in a single policy group. BellSouth believes the Commission should therefore endorse the concept of a new forum with policy development responsibilities and allow that forum to further define the substructure or any supporting committees required to support that function.

Similar to other industry fora, such as the Future of Numbering Forum ("FNF") and Industry Numbering Committee ("INC"), the World Zone 1 Numbering Organization would attempt to achieve consensus on policy issues within a specified time frame. In those instances where consensus could not be reached, the issues would be referred to the Commission for resolution. In addition significant policy issues would be referred to the Commission for approval. This process would provide the industry the opportunity to properly analyze complex numbering issues. Further, under this process, at the time of Commission involvement, issues would be narrowly focused and Commission involvement and decision making would be expedited.

In BellSouth's view, the World Zone 1 Numbering Organization would also have the widespread participation

³ AT&T, pp. 8-14; Sprint, pp. 8-9; GTE, pp. 7-9; NYNEX, pp. 5-8; Stentor, pp. 5-6; Bell Atlantic, pp. 5-6; U.S. West, pp. 4-6; Ameritech, pp. 3-8; AT&T, pp. 5-10.

and expertise to provide assistance in the analysis and resolution of many of the other issues raised in this proceeding. In BellSouth's view, many of the issues raised in this docket are appropriate for further review and refinement in an industry body comprised of various segments of the industry. Various commenters supported this view.⁴

In fact, the Commission's adoption of rules on certain issues based on the record in this proceeding may be premature and, in the long term, not in the public interest. Instead, BellSouth recommends that the Commission adopt broad parameters and guidelines regarding the future numbering framework and assign the World Zone 1 Numbering Organization the responsibility of refining and coordinating the details of these issues. For example, the World Zone 1 Numbering Organization could provide valuable input in the development of a Request for Proposal ("RFP") to select the future NANP administrator. Further, the World Zone 1 Numbering Organization can assist in the determination of the scope, mission, personnel requirements, management structure, and funding of the new administrator of the NANP.

In summary, this proposed structure provides the proper framework for the future resolution of numbering issues and should be adopted by the Commission. This proposed framework builds on the industry's proven history of using

⁴ Stentor, p.2; Ameritech, p. 3; S.W. Bell, p. 7; ATIS, pp. 5-10; NYNEX, pp. 5-8.

industry fora or standards bodies to address complex numbering matters. It also provides for the centralization of numbering issues in a single organizational structure. Finally, the coordinated participation of the NANP administrator, various industry groups, and the Commission should provide the proper framework for the efficient assignment of numbering resources and the effective analysis and resolution of numbering matters.

B. Administration of the NANP

There was general consensus among the commenters that the administration of the NANP should be assigned to an independent third party entity not associated with any industry segment.⁵ As stated in its Comments to the NPRM, BellSouth supports the transfer of the NANP administration function to a competent third party administrator. In BellSouth's view, the future administrator must possess the technical and managerial skills to efficiently allocate numbering resources.

Several commenters, including BellSouth, recommended that an RFP or competitive bid process be utilized to select a new NANP administrator.⁶ Under BellSouth's proposal, this

⁵ BellSouth, pp. 1-6; Bell Atlantic, p. 2; Stentor, p. 3; Ameritech, pp. 3-8; NARUC, p. 4; NYNEX, p. 4; AT&T, pp. 8-10; GTE, pp. 9-23; Sprint, pp. 4-6; MCI, pp. 3-4; USTA, pp. 3-4; McCaw, pp. 2-3, APC, pp. 2-3; AT&T, pp. 1-2; Ad AOC Telecommunications Users, pp. 1-4; MMTA, pp. 4; CTIA, pp. 2-3; AT&T, pp. 2-4; NARUC, p. 4.

⁶ MCI, pp. 9-10; BellSouth, p. 9; Teleport, p. 6; GTE, pp. 9-10; Sprint, pp. 5-6.

RFP would be coordinated by the World Zone 1 Numbering organization described above. The use of an RFP process should result in the identification of an entity to function as NANP administrator with a demonstrated showing of the necessary skills to function as NANP administrator. The RFP process should also permit the industry to provide input into the operating parameters and the responsibilities of the NANP administrator.

Further, BellSouth recommends that the Commission in this proceeding provide the industry direction concerning the broad responsibilities and parameters the NANP administrator should perform. It should specifically direct the World Zone 1 Numbering Organization to solicit input on these issues during the RFP process.

Under BellSouth's proposal for the future framework, the NANP administrator could also work with the World Zone 1 Numbering Organization to address the policy implications of its administrative responsibilities. For example, the NANP administrator could work with the World Zone 1 Numbering Organization to address the procedures for planning the implementation of new NPAs or the interpretation and application of the industry's Central Office Code Assignment Guidelines.

C. Transfer of the INC Function to the New Framework

Several commenters recommended that the new framework include a single group to address technical issues related

to numbering matters. Specifically, these commenters recommended that this function be performed by the INC or a group similar to the INC.⁷ BellSouth recommends that under the new framework, the existing INC be transferred to the new proposed framework. The transfer of the INC to the new framework would result in the consolidation of all numbering activities within a single organization. Further, as new telecommunications technologies and applications emerge requiring numbering resources, a single, competent group to address technical issues is critical to the efficient assignment of numbering resources and effective analysis of numbering issues.

D. Alternative Dispute Resolution

In its Comments to the NPRM, BellSouth supported the activities of the FNF concerning the use of alternative dispute resolution techniques to address numbering disputes.⁸ BellSouth supports the recommendations of several commenters that active Commission involvement in the establishment of the parameters for the use of alternative dispute resolution would be beneficial.⁹ For example, these commenters recommended that the Commission establish a specific time frame for industry analysis of an issue prior to the referral of the issue to the Commission for final

⁷ GTE, pp. iv; USTA, pp. 9-10; Ameritech, p. 5.

⁸ BellSouth, pp. 8-9.

⁹ AT&T, p. 11; PacTel, p. 5; USTA, p. 5.

resolution.¹⁰ BellSouth supports the use of such procedures to expedite the resolution of numbering matters.

In particular, BellSouth conceptually supports the use of procedures similar to the procedures described in the Commission docket to address the application of the Administrative Dispute Resolution Act (ADRA) and Negotiated Rulemaking Act (NRA) to disputes within the Commission's jurisdiction.¹¹ Under the procedures described in the ADRA and NRA, a representative of the Commission would participate in a negotiation committee consisting of industry participants to attempt to negotiate the resolution of certain issues. The Commission's representative would be authorized to represent any policy concerns of the Commission. Similarly, it would appear that active Commission participation in the deliberations of the World Zone 1 Numbering Organization in the development of policy recommendations would accomplish the objectives envisioned by the ADRA and NRA. Any consensus recommendation from the World Zone 1 Numbering Organization, acting in effect as an ADRA and NRA-type negotiation committee, would be submitted to the Commission for expedited rulemaking. BellSouth, therefore, recommends that the industry and the Commission

¹⁰ USTA, pp. 5; AT&T, pp. 11; PacTel, p. 5.

¹¹ See e.g., In the Matter of Use of Alternative Dispute Resolution Procedures in Commission Proceedings and Proceedings in which the Commission is a Party, 6 F.C.C. Rcd. 5669, 5671 (1991); 7 F.C.C. Rcd. 4679 (1992).

continue to evaluate alternative dispute resolution methods that might facilitate the resolution of numbering issues in a structure where policy issues are addressed in an industry policy group.

E. Funding of the Future NANP

In the Comments filed in response to the NPRM, many commenters recognized the necessity of a funding mechanism to recover reasonable expenses associated with numbering matters.¹² Specifically, the parties generally endorsed the concept of either a cost based system where fees are paid to the administrator or the creation of a fund to recover expenses associated with the allocation of numbering resources. BellSouth believes that the identification of the appropriate funding mechanism prior to the resolution of the NANP structure and functions is inappropriate. It can be expected that the structure and function of the NANP will have a direct impact on the selection of the proper funding proposal. Therefore, BellSouth recommends that the Commission delay the adoption of a funding proposal and assign to the World Zone 1 Numbering Organization the responsibility of collecting further information concerning the two proposals and developing a recommendation for the recovery of expenses associated with numbering matters.

¹² USTA, pp. 7-8, ATIS, pp. 12-12; NARUC, p. 5; Vanguard, pp. 12-14; Airtouch, p. 5; AT&T, pp. 11-12; Sprint, pp. 9-10; Nextel, pp. 10-13; GTE, pp. 13-14; MCI, pp. 12-13, U.S. West, pp. 6-8; Bell Atlantic, pp. 5-6; Ameritech, p. 3; NYNEX, p. 13.

II. Central Office Code Administration

In previous Comments in this proceeding, BellSouth supported the transfer of the Central Office Code assignment function to the future NANP administrator.¹³ While many of the commenters supported this position, several commenters questioned the timing of the transfer of the Central Office Code assignment function.¹⁴

BellSouth agrees that the transfer of the Central Office Code assignment function involves several complex issues that require careful analysis. For example, the relationship between the Central Office Code assignment function and NPA relief planning has significant implications for the industry and requires additional analysis. In view of these concerns, the Commission should endorse the transfer of Central Office Code administration responsibilities to the future NANP administrator. It should, however, direct the industry, through the new World Zone 1 Numbering Organization, to further analyze the issues raised by the transfer of this function to a new entity and to establish a time frame for the transfer of the function to a new entity.

¹³ BellSouth, pp. 9-10.

¹⁴ USTA, pp. 7-8; GTE, pp. 12-12; NYNEX, pp. 9-11; S.W. Bell, pp. 10-13; Cincinnati Bell, p. 3.

III. CIC Expansion

BellSouth continues to believe that the Commission's proposal of a six year transition period for the implementation of CIC expansion is excessive and may potentially create unnecessary delay and confusion in the transition to four digit CICs. In fact, BellSouth believes that the six year period is an artificial milestone that may in the long run create significant operational problems. Additionally, as several commenters pointed out, the CIC transition period can only last as long as CICs in the 5000 and 6000 series are available.¹⁵ In BellSouth's view, the six year transition period proposed by the Commission has no correlation to the availability of CIC codes and should therefore be modified to a period of eighteen months.

IV. Interstate IntraLATA Presubscription

In the NPRM, the Commission requested comments on whether it should establish procedures to modify the current practice that reserves the transport of interstate intraLATA calls to the Local Exchange Carrier. Comments in support of this proposed modification came, as would be expected primarily from interexchange carriers.¹⁶ However, these carriers failed to offer any evidence that the current

¹⁵ S.W. Bell, pp. 13-16; NYNEX, pp. 14-18; PacTel, pp. 10-11; U.S. West, pp. 13-18.

¹⁶ AT&T, pp. 4-7; MCI, pp. 13-14; MFS, pp. 6-7; Telecommunications Resellers of America, pp. 7-8; Comptel, pp. 1-7.

practice was discriminatory or not in the public interest. As BellSouth stated in its Comments to the NPRM, the current practices are reasonable and should not be modified at this time.¹⁷

The Commission recognized in the NPRM, that the amount of interstate intraLATA traffic is relatively small.¹⁸ The modification of the current practice for this small volume of traffic would require significant administrative and network expense. In fact, the benefit to the public in the modification of the current practice for handling this traffic is virtually nonexistent or minimal.

In addition, modification of the procedures for handling interstate intraLATA traffic prior to BellSouth obtaining the authority to provide interLATA service would place BellSouth at a significant disadvantage. Further, modification of the current procedure without consideration of proceedings to address intrastate intraLATA traffic could create significant administrative expense and customer confusion. In view of the foregoing, BellSouth recommends that the Commission confirm that the current procedures for interstate intraLATA traffic be maintained.

V. Conclusion

The comments filed in response to the NPRM represent a broad endorsement of the future framework for the

¹⁷ BellSouth, pp. 14-17.

¹⁸ NPRM, para. 57.

administration of the NANP. The Commission should endorse this framework and direct the industry to further evaluate the specific details required to implement this structure. The foundation of the future framework is a single organizational structure to address numbering issues. The expeditious adoption of this structure by the Commission is an important first step in the creation of a framework for the efficient and effective analysis and resolution of future numbering issues.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of June, 1994 served all parties to this action with a copy of the foregoing REPLY COMMENTS OF BELLSOUTH by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached.


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